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U.S. DISTRICT COURT WESTERN DISTRICT OF LOUISIANA

MAY 2 1 1996

## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA

ROBERT H. SHEMWELL, CLERK
BY DEPUTY

SHREVEPORT DIVISION

§	CASE NO. CV95-2115S
§	
§	
§	
§	
§	JUDGE STAGG
§	
§	•
§	MAGISTRATE JUDGE PAYNE

## MOTION FOR EXTENSION OF TIME

NOW INTO COURT, through undersigned counsel, comes defendant, ATLANTIC RICHFIELD COMPANY ("ARCO" or "defendant"), who respectfully moves the court for a short extension of time during which defendant may respond to Plaintiffs' First Request for Admissions to Defendant, for the following reasons:

1.

On April 24, 1996, plaintiffs served their First Request for Admissions to Defendant, constituting sixty-one (61) requests.

2.

Responses to these requests will otherwise be due on Friday, May 24, 1996.

3.

Defendant needs additional time in which to prepare its responses. By order issued April 25, 1996, a deadline of May 31, 1996 was established for defendant to serve responses to certain



document requests and interrogatories previously propounded by plaintiffs.

4.

Defendant requests that the time for filing its answers or objections to Plaintiffs' First Request for Admissions to Defendant be extended for one (1) week, to and including May 31, 1996.

5.

Defendant is authorized to represent that counsel for plaintiffs do not oppose this Motion.

WHEREFORE, DEFENDANT, ATLANTIC RICHFIELD COMPANY, PRAYS that the time during which defendant may answer or object to Plaintiffs' First Request for Admissions to Defendant be extended to and including Friday, May 31, 1996.

Shreveport, Louisiana, this 2/2 day of May, 1996.

Roger L. Freeman, Colorado Bar #015003 Joel O. Benson, Colorado Bar #024471 DAVID GRAHAM & STUBBS, L.L.C. Suite 4700 370 Seventeenth Street Denver, Colorado 80202 Telephone: (303) 892-9400

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By: My Ala

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ATTORNEYS FOR DEFENDANT, ATLANTIC RICHFIELD COMPANY

## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA SHREVEPORT DIVISION

CRYSTAL OIL COMPANY AND	§	CASE NO. CV95-2115S
CRYSTAL EXPLORATION AND	§	
PRODUCTION COMPANY,	§	
Plaintiffs,	§	
	§	
vs.	§	JUDGE STAGG
	S	
ATLANTIC RICHFIELD COMPANY,	§	·
Defendant.	§	MAGISTRATE JUDGE PAYNE

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing Motion for Extension of Time has been served upon plaintiffs' counsel of record, Osborne J. Dykes, III, Fulbright & Jaworski, 1301 McKinney, Suite 5100, Houston, Texas 77010-3095, and Albert M. Hand, Jr., Cook, Yancey, King & Galloway, P. O. Box 22260, Shreveport, Louisiana 71120-2260, by depositing a copy of same in the U.S. Mail, properly addressed, with adequate postage affixed thereto.

OF COUNSEL